

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

In re CASSAVA SCIENCES, INC.	§	
SECURITIES LITIGATION	§	Master File No. 1:21-cv-00751-DAE
_____	§	
	§	CLASS ACTION
This Document Relates To:	§	
	§	
ALL ACTIONS.	§	
_____	§	
	§	

**AGREED MOTION FOR FILING CONSOLIDATED COMPLAINT AND MOTION TO
DISMISS BRIEFING**

Lead Plaintiff Mohammad Bozorgi (“Lead Plaintiff”) and defendants Cassava Sciences, Inc., Remi Barbier, Eric J. Schoen, James W. Kupiec, Nadav Friedmann, and Michael Marsman (collectively, “Defendants”) (together with Lead Plaintiff, the “Parties”), hereby jointly agree, subject to the Court’s approval, to a proposed schedule for: (1) the filing of Lead Plaintiff’s consolidated complaint; and (2) briefing on Defendants’ motion to dismiss the consolidated complaint.

WHEREAS:

1. The first complaint in this consolidated action was filed by Pierre Brazeau on August 27, 2021 (No. 1:21-cv-00751-RP) on behalf of a purported class of purchasers of securities of Cassava Sciences, Inc.;

2. On June 30, 2022, the Court consolidated all related actions and ordered the Parties to, among other things, confer within 14 days of the Court’s appointment of Lead Plaintiff and propose a schedule for: (1) Lead Plaintiff to file a consolidated complaint; and (2) briefing on Defendants’ motion to dismiss the consolidated complaint (ECF 58);

3. On June 30, 2022, the Court also appointed Mohammad Bozorgi as Lead Plaintiff and approved his selection of counsel, Robbins Geller Rudman & Dowd LLP, as Lead Counsel (ECF 59); and

4. The Parties have agreed to the following proposed schedule for the filing of the consolidated complaint and related motion to dismiss briefing.

IT IS HEREBY AGREED TO, by and between the undersigned Parties, and respectfully submitted for the Court’s approval, as follows:

1. Lead Plaintiff shall file a consolidated complaint no later than August 18, 2022;
2. Defendants shall file a motion to dismiss the consolidated complaint no later than October 17, 2022;

3. Lead Plaintiff shall file an opposition to the motion to dismiss the consolidated complaint no later than December 16, 2022; and

4. Defendants shall file a reply in support of the motion to dismiss the consolidated complaint no later than January 16, 2023.

This Agreed Motion will serve the interests of justice and the Parties agree that the proposed Order filed herewith may be entered without further notice.

DATED: July 14, 2022

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DATED: July 14, 2022

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Nadav Friedmann, and Michael Marsman

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he has conferred by email on July 13 and 14, 2022 with Alexander K. Talarides, counsel for Defendants, who confirmed that each Defendant agreed to this motion.

/s/ Kevin A. Lavelle

KEVIN A. LAVELLE

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on July 14, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Joe Kendall

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